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Attorney for Debtor(s)

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

IN RE:

Susan Zajac

Debtor (s)

Case No. 17-15223 (MBK)

Chapter 13

**CERTIFICATION IN OPPOSITION TO
TRUSTEE'S OBJECTION TO DEBTOR'S
CHAPTER 13 PLAN**

Kurt E. Reinheimer, Esq., hereby certifies and says:

1. I am the attorney representing the Debtor Susan Zajac and make this certification in opposition to the Trustee's objection to Debtor's chapter 13 bankruptcy plan.

2. The trustee's objection begins by noting certain documents have failed to be supplied. More specifically, trustee required 2016 taxes, Homeowner's insurance renewal declaration and copy of deed.

3. On or about May 12, 2017 the 2016 state and federal taxes; proof of renewed Homeowner's insurance and a copy of the deed were forward to the trustee through 13 Docs.

4. The trustee's objection goes on to state the debtor's plan consists of unnecessary expenses such as an IRS payment of \$350.00, a \$154.67 timeshare payment and \$230.00 miscellaneous expense. The objection goes on to argue the debtor is failing to devote all disposable income into the plan and is paying less than that which would be distributed upon liquidation under chapter 7.

5. The plan as initially proposed is paying 100% of all claims and the plan was shortened from 60 month. As such, the position advanced by the trustee bears no merit.

6. Lastly, the trustee argues the plan divides unsecured claims into classes with no rational basis. More specifically, the initial plan proposed to pay the IRS outside of the plan.

7. A modified plan is being prepared which will include payments of all IRS claims within the soon-to-be filed modified plan.

8. Based on the foregoing, it is respectfully requested that the objection of the Trustee be denied and the plan be confirmed as filed.

I hereby certify that the foregoing statements made by me are true. I understand that if any of the foregoing statements are willfully false, I am subject to punishment.

Dated: May 16, 2017

/S/ KURT E. REINHEIMER, ESQ.
KURT E. REINHEIMER, ESQ.